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## LATHAM & WATKINS LLP

December 12, 2022

### VIA ECF

Hon. Leda Dunn Wettre, U.S.M.J.  
United States District Court  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

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Re: *Occidental Chemical Corp. v. 21st Century America, Inc., et al.*, No. 2:18-cv-11273-MCA-LDW

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Dear Judge Wettre:

This firm represents defendant PPG Industries, Inc. (“PPG”) in the above-captioned matter. Pursuant to Local Civil Rule 101.1(c)(5), we respectfully request Your Honor’s approval of the withdrawal of Thomas Pearce of Latham & Watkins LLP as PPG’s pro hac vice counsel. Mr. Pearce was admitted pro hac vice on behalf of PPG by this Court’s Order on October 17, 2019 (Dkt. No. 866).<sup>1</sup>

Latham & Watkins LLP intends to file a substitution of counsel shortly, so that the law firm of Babst, Calland, Clements & Zomnir, P.C. will replace Latham & Watkins LLP as attorneys of record for PPG. Until that time, PPG will continue to be represented by its other counsel of record at Latham & Watkins LLP, including Gary Gengel and myself, in this action.

If Your Honor approves, we respectfully request that this letter be “So Ordered” by Your Honor and filed on the docket. We appreciate the Court’s attention to this matter.

Respectfully submitted,

/s/ Kegan A. Brown  
Kegan A. Brown  
of LATHAM & WATKINS LLP

cc: All Counsel of Record (via ECF)

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<sup>1</sup> This withdrawal relates to PPG only. Thomas Pearce of Latham & Watkins LLP will continue to be admitted pro hac vice to represent defendants General Electric Company and Sequa Corporation in this action.

**LATHAM & WATKINS LLP**

SO ORDERED this \_\_\_\_ day of December 2022.

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Hon. Leda D. Wettre, USMJ